

1907-028 Chancery Causes: Eunice Hedrick vs. William Z. Hedrick
Lee Co

Hedrick

CA-Divorce

To the Honorable H.A.W.Skeen, Judge of the Circuit Court for

Lee County, Virginia:

Humbly complaining, your oratrix, Eunice Headrick would respectfully represent and show unto the court:

That she is now and has been for more than twelve months next preceding the institutin of this suit, a citizen of this county and state,

That on the _____ day of _____ 18____, she intermarried with one William Headrick, and lived and cohabited with him as his lawful wife for several, and to her as a result of said marriage two children were born, both of which are now over the age of fourteen years;

That she was a faithful and obedient wife to her said husband and wold have been glad could they have continued to live together as man and wife;

That more than three years ago her said husband without the fault or connivance of your oratrix left his home and abandoned your oratrix leaving to her the care, custody and expense of rearing their to infant children, and has never returned to your said oratrix, and during all which time he has never contributed in any way to her support or the support of said children;

:or has your oratrix cohabited with him since he abandoned her more than three years ago.

Being remidiless therefore save in a court of equity, the prayer of your oratrix is that the said William Headrick be made a party defendant to this bill and be required to answer same, but not on oath that being waived, that proper process issued, and that upon a final hearing ~~she~~ be granted a divorce a vinculo matrimonii from said William Headrick, and that all such other and general relief be granted your oratrix, as justice and the nature of her case demand, and she will ever pray, etc.

J. B. Hall P.Q.

Emmie Headrick
vs { Bill in Chancery.

William Headrick

Filed Jan. 8, 1907

J. C. T. Ewing

1907 1st Jan'y Rules
Bill filed, Ipa.
ex. ruled
2nd Jan'y Rules
Court set for
hearing.

Costs:

Clerk \$3.55
Tax 1.50
Shff. 1.00
Atty 15.00
\$21.05

1900 to 10

and she will ever pray, etc.

Emmie Headrick, as Petitioner and the Petitioner of her case demand,
William Headrick, and that all and other and General relief be
granted her by granting a divorce in Absentia from said
that being advised, that Petitioner has been advised, and that upon a final
of your Petitioner is that the said William Headrick be made a party co-
Being remissive therefore leave in a court of equity, the proper
than three years ago.

or has your Petitioner cohabited with him since he abandoned her more
support of said children;

which time he has never contributed in any way to her support or the
children, and has never returned to your said Petitioner, and during all
leaving to her the care, custody and expense of rearing their to infant
or compliance of your Petitioner with his home and abandoned your Petitioner

Emmie Headrick - Plff.
vs { In Chancery
William J. Headrick - Deft.

This Cause came on this day to be heard upon the complainant, process duly served, and the depositions of witnesses, and was argued by counsel. In consideration of all which it is adjudged ordered and decreed, it ^{appearing to the court} from the depositions of witnesses read in this cause, the complainant is entitled to an absolute divorce from the defendant; that the bonds of matrimony heretofore contracted and up to this time existing between the complainant and defendant, be and the same is hereby dissolved. It is further adjudged ordered and decreed that the complainant recover her costs against the defendant, and that he be restrained from marrying again until said costs are paid.

Emmie Hendrich
vs { Decree

Wm J. Hendrich

Entered in C.O.B.
#8, page 258-

Enter this
decree. This
Feb 19th 1907,
H. A. W. Smith
Judge

To William Headrick,

You will please take notice that on the 12th day, January, 1907 I will proceed to take the depositions of John Headrick and others, at the law office of J.C. Noel in the town of Pennington Gap, in said county, of Lee, to be read in my behalf in a certain suit in equity, now depending in the circuit court of Lee County, Virginia, wherein I am Plaintiff, and you are the defendant.

Respectfully,

Eunice Headrick.

By Counsel.

Ernie Headrick
vs { & Chanery.

William Headrick

Notice to take depositions.

Virginia, Lee Co.
to-wit:

This day personally
appeared before me
John Lencinberry and
made oath that he
executed the within
notice on 5th day of
Jan. 1907, and by
delivering a true copy
thereof to William
Headrick.

Given under my
hand this 12 day of
Jan. 1907.

Charles B. Bales

W.P.

The depositions of Eunice headrick, John Headrick and others taken before me, W.K. Hopkins, a commissioner in chancery for the Circuit Court for Lee County Virginia, at the law office of J.C. Noel in the town of Pennington Gap, in said county, on the 12th day of January, 1907, between the hours of 9 O'clock A.M. and 4 ~~at~~ O'clock P.M., to be read in evidence in behalf of the Plaintiff in a certain suit in equity depending in the circuit court of Lee county, Virginia, wherein Eunice Headrick is plaintiff and William Headrick is defendant, taken pursuant to the annexed notice.

Present: J.C. Noel, attorney for plaintiff.

Eunice Headrick, a witness of lawful age being duly sworn deposes and says:

Ques. 1 Please state your age and residence?

I am 38 years old and am now and been all my life a resident of Lee County, Virginia.

Ques. You are the the plaintiff in this suit are not.

Ans. Yes sir.

Ques. When were you married to the defendant, William Headrick?

Ans. About 20 years ago.

Ques. How many Children have you by your said husband?

Ans. Two. both are living, the elder is now 19 years old and the younger 17.

Ques. Are you and you husband now living together as man and wife?

If not how long have you been separated?
been

+Ans. We are not. We have ^{been} separated, four years last December. He abandoned me in December, 1902, and we have not cohabited together since, he left me.

Has he contributed to your support, or the support of your children since he abandoned you in Dec. 1902?

Ans. Not one cent. I have had to make my support entirely by myself with the help of my son John.

And further this deponent sayeth not.

Eunice Headrick

John Headrick a witness of lawful age being duly sworn deposes and says.

Ques.State your age residence,and occupation.

Ans.I am 17 years old,reside at Ben Hur,Va.with My mother,
Eunice He adrick.

Ques.What relation are you to William Headrick and Eunice Headrick,the parties to this suit.

Ans.I am their son.

Question.Does your father and mother now live together as man and wife?8f not how long have they been separated.

Ans.No sir.They have separated about four years.

During the past four years,has your father contributed to the support of your mother,and you and your sister.

Ans.He has not.

Which of your parents abandoned the other.

Ans.My father abandoned my mother.

I have lived with my mother ever since my father left her and I know they have not cohabited together for more than four years And further this deponent sayeth not.

John Headrick

Virginia, Lee County, to wit:

I, W.K. Hopkins, a Commission in chancery for the Circuit Court for Lee County, Virginia, do certify that the foregoing deposition of Eunice Headrick and John Headrick were taken, subscribed and sworn to before me in my county aforesaid at the time place and for the purposes mentioned therein.

Given under my hand this 12th day of January, 1907.

W.K. Hopkins Commissioner
in Chancery.

IN QUERCEL.

Techniques Limited

2

1970-1971

Strengthen your letter and support, not
your letter and support, not

Emmie Headrick
vs { Deposition
William Headrick.

Filed January 21, 1907.
H.C. P. Ewing.
W.H.

The Commonwealth of Virginia, .

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon *Wm Z Headrick*

to appear at the Clerk's office of the Circuit Court of the County of Lee, at rules to be held for the said court, on
the *1st* Monday in *January*, 190*7*, to answer a bill in chancery exhibited against *him*
in our said Court by Eussie Headrick

And have then there this writ. Witness, H. C. T. EWING, Clerk of our said Court, at the court-house, the *4th*
day of *December*, 190*6*, and 1 *31* year of the Commonwealth.

A Copy, Teste:

H. C. T. Ewing, Clerk.

_____, Clerk.

Eunice Hedrick

VS

}

SUBPCENA
IN
CHANCERY.

Wm J Hedrick

J. C. Noel, p. q

To 1st January Rules.

Lee Higginson Court.

Executed By sum
Wm J Hedrick
this the 8 day of Dec
1906
C. E. Denny SS